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November 15, 2023

**DELIVERED VIA ECF**

The Honorable Sarah Netburn  
Thurgood Marshall Courthouse  
40 Foley Square, Courtroom 219  
New York, NY 10007

**Case Title:** *Freeman v. Deeks-Elkenaney et al,*  
**1:22-cv-02435-LLS-SN**  
**Re:** **Request to extend summary judgment filing date by two days.**

Your Honor:

On October 11, 2023 this Court continued the deadline for Plaintiff Lynne Freeman to file her summary judgment motion to Monday, November 20, 2023. See Dkt. No. 269. Although the Court stated that no further extensions would be granted, Mrs. Freeman has been suffering significant health complications, including bacterial infections for which she is under the care of her physician. In the interest of her privacy, she has asked that we not publicly disclose more, but if verification of her condition and her inability to function at normal capacity is necessary, she is willing to provide information to the Court in whatever format it wishes.

At our client's request, we asked Defendants to agree to a brief extension of two additional days to file Ms. Freeman's opening brief. Counsel for Defendants graciously consented, and the parties agreed that if Defendants needed a reciprocal extension Plaintiff would agree.

Plaintiff's compromised health has previously been brought to this Court's attention, and her current issues have seriously compromised her ability to timely review the motion and supporting documents, including the voluminous evidence that will be attached to her declaration, to ensure that everything is accurate before filing. She therefore requests that this Court grant a final brief allowance until November 22, 2023 for her to file her opening summary judgment brief.

We thank Your Honor for consideration of this matter.

Respectfully submitted,

By: /s/ Stephen M. Doniger  
Stephen M. Doniger  
Scott Alan Burroughs  
DONIGER / BURROUGHS, PC  
For the Plaintiff